

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

United States of America,

Plaintiff,

vs.

Case: 2:22-cr-20059  
Judge: Edmunds, Nancy G.  
MJ: Grand, David R.  
Filed: 02-08-2022 At 03:48 PM  
INDI USA V. SEALED MATTER (DA)

D-1 Valentino Richardson,  
a.k.a "T," "Tino," "Redman,"  
"Rude Boy,"

Violations:

21 U.S.C. § 846  
21 U.S.C. § 841  
18 U.S.C. § 922  
18 U.S.C. § 924(c)

D-2 David McNair,  
a.k.a "Disco," "Sco,"

D-3 Omar Makram,  
a.k.a "O,"

D-4 Yourye Wilson,  
a.k.a. "Gooey,"

D-5 William Johnson,  
a.k.a "Bill,"

D-6 Freddie Ross,  
a.k.a "Bang Bang," "Trump,"

D-7 Barry Vaughn,  
a.k.a "BR,"

D-8 Anthony Gordon,

D-9 Rachelle Bramlett,

D-10 Devin O'Brien,

D-11 Julius Simmons,

D-12 Antwan Kelso,  
a.k.a. "Twan"

D-13 Symion Minion

Defendants.

---

## **INDICTMENT**

The Grand Jury charges that:

### **COUNT ONE**

(21 U.S.C. § 846 – *Conspiracy to Distribute and to Possess with Intent to Distribute Controlled Substances*)

D-1 Valentino Richardson

D-2 David McNair

D-3 Omar Makram

D-4 Yourye Wilson

D-5 William Johnson

D-6 Freddie Ross

D-7 Barry Vaughn

D-8 Anthony Gordon

D-9 Rachele Bramlett

D-10 Devin O'Brien

D-11 Julius Simmons

D-12 Antwan Kelso

D-13 Symion Minion

### **Introduction**

At all times relevant to this Indictment:

1. Valentino Richardson, also known as "T," "Tino," "Redman," and "Rude Boy," operated a drug trafficking organization (DTO) based in Detroit, Michigan that involved several other states.

2. David McNair, also known as “Disco” and “Sco,” in conjunction with Richardson, operated the DTO in Detroit, Michigan and elsewhere. David McNair also distributed controlled substances obtained by the Richardson/McNair DTO within Detroit, Michigan, and elsewhere.

3. Omar Makram, also known as “O,” and “Joshua Johnson,” prepared and shipped parcels containing controlled substances and drug proceeds on behalf the Richardson/McNair DTO from the Eastern District of Michigan to California, and elsewhere.

4. Yourye Wilson, also known as “Gooley,” distributed controlled substances obtained by the Richardson/McNair DTO within Detroit, Michigan, and elsewhere.

5. William Johnson, also known as “Bill,” facilitated the acquisition of controlled substances for the conspiracy from source(s) of supply in Ohio and distributed controlled substances obtained by the Richardson/McNair DTO within Detroit, Michigan, and elsewhere.

6. Freddie Ross, also known as “Bang Bang” and “Trump,” distributed controlled substances obtained by the Richardson/McNair DTO within Detroit, Michigan, and elsewhere.

7. Barry Vaughn, also known as "BR," distributed controlled substances obtained by the Richardson/McNair DTO within Detroit, Michigan, and elsewhere.

8. Donald Deshazo, also known as "Q," and "Quack," distributed controlled substances obtained by the Richardson/McNair DTO in Detroit, MI, and elsewhere.

9. Anthony Gordon obtained controlled substances from the Richardson/McNair DTO for further distribution within Detroit, Michigan, and elsewhere.

10. Rachele Bramlett obtained controlled substances from the Richardson/McNair DTO and distributed those controlled substances to co-conspirators located in Detroit, Michigan, and elsewhere.

11. Devin O'Brien agreed to receive controlled substances from a member(s) of the Richardson/McNair DTO which he intended to further distribute within Detroit, Michigan, and elsewhere.

12. Julius Simmons received controlled substances from a member(s) of the Richardson/McNair DTO which he intended to further distribute within Detroit, Michigan, and elsewhere.

13. Antwan Kelso, also known as "Twan," distributed controlled substances obtained by the Richardson/McNair DTO and possessed controlled substances which he intended to further distribute within Detroit, Michigan, and elsewhere.

14. Symion Minion agreed to receive controlled substances in Kentucky from a member(s) of the Richardson/McNair DTO which were intended to be further distributed elsewhere.

Conspiracy to Possess with  
Intent to Distribute and Distribute Heroin

15. Beginning in or around October 2020, the exact date being unknown to the Grand Jury, and continuing until at least December 14, 2021, in the Eastern District of Michigan and elsewhere, the defendants, VALENTINO RICHARDSON, DAVID MCNAIR, OMAR MAKRAM, YOURYE WILSON, WILLIAM JOHNSON, FREDDIE ROSS, BARRY VAUGHN, DONALD DESHAZO, ANTHONY GORDON, RACHELE BRAMLETT, DEVIN O'BRIEN, JULIUS SIMMONS, ANTWAN KELSO, SYMION MINION and others, known and unknown to the grand jury, did knowingly and intentionally combine, conspire, confederate, and agree with each other, and with other persons known and unknown to the Grand Jury, to distribute, and to possess with intent to distribute,

one kilogram or more of a mixture or substance containing heroin, five kilograms or more of a mixture or substance containing cocaine, 400 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly known as fentanyl, and between 50 and 100 kilograms of mixture and substance containing a detectable amount of marijuana in violation of Title 21, United States Code, Sections 846, 841(a)(1), 841(b)(1)(B)(i), (ii), and (vi), 841(b)(1)(C).

#### Manner and Means

It was part of the conspiracy that defendants were part of a drug trafficking organization (DTO) that obtained quantities of heroin, cocaine, fentanyl and marijuana for distribution.

15. It was part of the conspiracy that the DTO utilized houses—some which were owned or occupied by members of the conspiracy—within the City of Detroit and elsewhere, for distribution of the controlled substances, storage of controlled substances and currency generated from the sale of controlled substances. It was part of the conspiracy that the DTO possessed firearms, which were kept and stored at the houses, for protection of the controlled substances, for

protection of the money received from sales, and for protection of individuals distributing the controlled substances. Members of the conspiracy would travel to various locations to distribute, store, process or obtain controlled substances for further distribution. Examples of houses utilized by DTO members for these purposes included, but are not limited to:

a. 13901 Ardmore, Detroit, Michigan: On October 14, 2021, a search warrant executed at this location resulted in the recovery of cocaine, methamphetamine, and a handgun.

c. 15360 Cruse, Detroit, Michigan: On December 14, 2021, a search warrant executed at this location resulted in the recovery of 63 grams of a mixture and substance containing a detectable amount heroin, a Schedule I controlled substance; 600 grams of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance; 1.4 kilograms of marijuana a Schedule I controlled substance; \$3,452 in United States currency, and two firearms.

d. 15373 Cruse, Detroit, Michigan: On December 14, 2021, a search warrant executed at this location resulted in the recovery of 232 grams of a mixture and substance containing a detectable amount

heroin, a Schedule I controlled substance; 26 kilograms of marijuana a Schedule I controlled substance; and two firearms.

e. 25192 Chestnut St., Taylor, Michigan: On December 14, 2021, a search warrant executed at this location resulted in the recovery of one firearm, and \$95,017 in currency.

f. 5129 Dudley, Detroit, Michigan: On December 14, 2021, a search warrant executed at this location resulted in the recovery of approximately 75 grams of a mixture and substance containing a detectable amount heroin, a Schedule I controlled substance; 300 grams of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance; 700 grams of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance; 19 kilograms of marijuana a Schedule I controlled substance; \$25,580 in United States currency, three firearms, and drug trafficking paraphernalia.

g. 4445 Dudley, Detroit, Michigan: On December 14, 2021, a search warrant executed at this location resulted in the recovery of approximately 1.5 kilograms of a mixture and substance containing a detectable amount heroin, a Schedule I controlled substance; 200 grams



of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance; 1.2 kilograms of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance; 19 kilograms of marijuana a Schedule I controlled substance; United States currency, multiple firearms, and drug trafficking paraphernalia.

16. It was part of the conspiracy that members of the DTO distributed controlled substances to each other and to other individuals for further sale and, eventually, for use.

17. It was part of the conspiracy that members of the DTO would use commercial shipping entities including FedEx and the United States Postal Service to transport controlled substances and currency generated from the sales of controlled substances or used to purchase additional controlled substances.

18. It was part of the conspiracy that members of the DTO would communicate about their drug trafficking activities—including to discuss controlled substances available, prices of controlled substances, and meeting locations for distribution of controlled substances—using cellular telephones. DTO members would frequently speak in coded

language, would use cellular telephones subscribed in fictitious and/or nominee names, and would change cellular telephone numbers all in their attempts to thwart law enforcement detection.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

**COUNT TWO**

(18 U.S.C. § 924(c) – *Possession of a  
Firearm in Furtherance of a Drug Trafficking Crime*)

D-1 Valentino Richardson

On or about December 14, 2021, in the Eastern District of Michigan, the defendant, Valentino Richardson, did knowingly possess firearms, to wit: a Berretta, model 9000S, 9mm pistol, serial number SZ019120, a Smith & Wesson, M&P 15, .223 caliber rifle, serial number TS09426, a Taurus, G2C, 9mm pistol, serial number TLX6242, and/or a Euro Arms, Witness P, .40 caliber pistol, serial number MT45189 in furtherance of a drug trafficking crime, that is, conspiracy to distribute and possess with intent to distribute controlled substances, as alleged in Count One of this indictment, in violation of Title 18, United States Code Section 924(c).

**COUNT THREE**

(21 U.S.C. § 841 –  
*Possession with Intent to Distribute*)

D-1 Valentino Richardson

On or about December 14, 2021, in the Eastern District of Michigan, the defendant, Valentino Richardson, knowingly and intentionally possessed with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of cocaine, 40 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly known as fentanyl, and less than 50 kilograms of a mixture or substance containing a detectable amount of marijuana, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(B)(ii), (v) and (b)(1)(D).

**COUNT FOUR**

(18 U.S.C. § 922(g)(1) – *Felon in Possession of a  
Firearm*)

D-1 Valentino Richardson

On or about December 14, 2021, in the Eastern District of Michigan, the defendant, Valentino Richardson, knowing that he had previously been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess

firearms, to wit: a Berretta, model 9000S, 9mm pistol, serial number SZ019120, a Smith & Wesson, M&P 15, .223 caliber rifle, serial number TS09426, a Taurus, G2C, 9mm pistol, serial number TLX6242, and/or a Euro Arms, Witness P, .40 caliber pistol, serial number MT45189, said firearms having previously traveled in interstate and/or foreign commerce, in violation of Title 18, United States Code Section 922(g)(1).

**COUNT FIVE**

(21 U.S.C. § 841 –  
*Possession with Intent to Distribute*)

D-2 David McNair

On or about December 14, 2021, in the Eastern District of Michigan, the defendant, David McNair, knowingly and intentionally possessed with intent to distribute 100 grams or more of a mixture or substance containing a detectable amount of heroin, 500 grams or more of a mixture or substance containing a detectable amount of cocaine, and 40 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly known as fentanyl, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(i), (ii), and (v).

**COUNT SIX**

(18 U.S.C. § 924(c) – *Possession of a  
Firearm in Furtherance of a Drug Trafficking Crime*)

D-2 David McNair

On or about December 14, 2021, in the Eastern District of Michigan, the defendant, David McNair, did knowingly possess firearms, to wit: a 45 caliber Glock, model 21 revolver, serial number VSD094, a Smith and Wesson, Model SD40VE, .40 caliber pistol, serial number HFL2438, and a Grand Power S.R.O, Model Stribog SP9A1, 9mm pistol, serial number GSA16846, in furtherance of a drug trafficking crime, that is, possession with intent to distribute, as alleged in Count Five of this indictment, in violation of Title 18, United States Code Section 924(c).

**COUNT SEVEN**

(18 U.S.C. § 922(g)(1) – *Felon in Possession of a  
Firearm*)

D-2 David McNair

On or about December 14, 2021, in the Eastern District of Michigan, the defendant, David McNair, knowing that he had previously been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess

firearms, to wit: a 45 caliber Glock, model 21 revolver, serial number VSD094, a Smith and Wesson, Model SD40VE, .40 caliber pistol, serial number HFL2438, and a Grand Power S.R.O, Model Stribog SP9A1, 9mm pistol, serial number GSA16846, said firearms having previously traveled in interstate and/or foreign commerce, in violation of Title 18, United States Code Section 922(g)(1).

**COUNT EIGHT**  
(21 U.S.C. § 841 –  
*Distribution of Controlled Substances*)

D-4 Yourye Wilson

On or about October 1, 2021, in the Eastern District of Michigan, the defendant, Yourye Wilson, knowingly and intentionally distribute a mixture or substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT NINE**  
(21 U.S.C. § 841 – *Possession with Intent to Distribute*)

D-4 Yourye Wilson

On or about November 3, 2021, in the Eastern District of Michigan, the defendant, Yourye Wilson, knowingly and intentionally possessed with intent to distribute less than 50 kilograms of a mixture or substance

containing a detectable amount of marijuana, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(D).

**COUNT TEN**

(21 U.S.C. § 841 – *Possession with Intent to Distribute*)

D-5 William Johnson

On or about November 17, 2021, in the Eastern District of Michigan, the defendant, William Johnson, knowingly and intentionally possessed with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(ii).

**COUNT ELEVEN**

(21 U.S.C. § 841 – *Possession with Intent to Distribute*)

D-5 William Johnson

On or about December 14, 2021, in the Eastern District of Michigan, the defendant, William Johnson, knowingly and intentionally possessed with intent to distribute 400 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny] propanamide, commonly known as fentanyl, and less than 50 kilograms of a mixture or substance containing a detectable amount

of marijuana, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A)(vi), (b)(1)(D).

**COUNT TWELVE**

(18 U.S.C. § 924(c) – *Possession of a  
Firearm in Furtherance of a Drug Trafficking Crime*)

D-5 William Johnson

On or about December 14, 2021, in the Eastern District of Michigan, the defendant, William Johnson, did knowingly possess firearms, to wit: a Glock, Model 42, .380 caliber pistol, serial number AESC705, and a Zastava, Model Pap M92 PV, 7.62 caliber pistol, serial number M92PV057528, in furtherance of a drug trafficking crime, that is, possession with intent to distribute, as alleged in Count Eleven of this indictment, in violation of Title 18, United States Code Section 924(c).

**COUNT THIRTEEN**

(21 U.S.C. § 841 – *Possession with Intent to Distribute*)

D-7 Barry Vaughn

On or about December 14, 2021, in the Eastern District of Michigan, the defendant, Barry Vaughn, knowingly and intentionally possessed with intent to distribute a mixture or substance containing a detectable



amount of cocaine, a mixture or substance containing a detectable amount of heroin, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT FOURTEEN**

(21 U.S.C. § 841 – *Possession with Intent to Distribute*)

D-8 Anthony Gordon

On or about June 21, 2021, in the Eastern District of Michigan, the defendant, Anthony Gordon, knowingly and intentionally possessed with intent to distribute a mixture or substance containing a detectable amount of cocaine, and a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly known as fentanyl, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT FIFTEEN**

(21 U.S.C. § 841 – *Possession with Intent to Distribute*)

D-9 Rachele Bramlett

On or about September 29, 2021, in the Eastern District of Michigan, the defendant, Rachele Bramlett, knowingly and intentionally possessed with intent to distribute a mixture or substance containing a

detectable amount of cocaine, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT SIXTEEN**

(21 U.S.C. § 841 – *Possession with Intent to Distribute*)

D-9 Rachele Bramlett

On or about October 1, 2021, in the Eastern District of Michigan, the defendant, Rachele Bramlett, knowingly and intentionally possessed with intent to distribute a mixture or substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT SEVENTEEN**

(21 U.S.C. § 841 – *Possession with Intent to Distribute*)

D-10 Devin O'Brien

On or about October 1, 2021, in the Eastern District of Michigan, the defendant, Devin O'Brien, knowingly and intentionally possessed with intent to distribute a mixture or substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT EIGHTEEN**

(21 U.S.C. § 841 – *Possession with Intent to Distribute*)

D-11 Julius Simmons

On or about July 23, 2021, in the Eastern District of Michigan, the defendant, Julius Simmons, knowingly and intentionally possessed with intent to distribute a mixture or substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT NINETEEN**

(21 U.S.C. § 841 – *Possession with Intent to Distribute*)

D-12 Antwan Kelso

On or about December 14, 2021, in the Eastern District of Michigan, the defendant, Antwan Kelso, knowingly and intentionally possessed with intent to distribute 100 grams or more of a mixture or substance containing a detectable amount of heroin, and less than 50 kilograms of a mixture or substance containing a detectable amount of marijuana, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C) and (b)(1)(D).

**COUNT TWENTY**

(18 U.S.C. § 924(c) – *Possession of a  
Firearm in Furtherance of a Drug Trafficking Crime*)

D-12 Antwan Kelso

On or about December 14, 2021, in the Eastern District of

Michigan, the defendant, Antwan Kelso, did knowingly possess firearms, to wit: a Smith & Wesson, Model M&P 15-22, .22 caliber rifle, serial number HCW9272, and a Taurus, Model 856, .38 caliber revolver, serial number JP52082, in furtherance of a drug trafficking crime, that is, possession with intent to distribute, as alleged in Count Twenty-Four of this indictment, in violation of Title 18, United States Code Section 924(c).

**COUNT TWENTY-ONE**

(18 U.S.C. § 922(g)(1) – *Felon in Possession of a Firearm*)

D-12 Antwan Kelso

On or about December 14, 2021, in the Eastern District of Michigan, the defendant, Antwan Kelso, knowing that he had previously been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess firearms, to wit: a Smith & Wesson, Model M&P 15-22, .22 caliber rifle, serial number HCW9272, and a Taurus, Model 856, .38 caliber revolver, serial number JP52082,, said firearms having previously traveled in interstate and/or foreign commerce, in violation of Title 18, United States Code Section 922(g)(1).

**COUNT TWENTY-TWO**

(21 U.S.C. § 856(a)(1) - *Maintaining a Drug Premises*)

On or about and between June 1, 2021 through on or about December 14, 2021, both dates being approximate and inclusive, in the Eastern District of Michigan and elsewhere, the defendants, VALENTINO RICHARDSON, DAVID MCNAIR, WILLIAM JOHNSON, DEVIN O'BRIEN did knowingly and unlawfully maintain certain places, to wit: residences known as 15360 Cruse, Detroit, Michigan; 15373 Cruse, Detroit, Michigan; 5129 Dudley, Detroit, Michigan, 4445 Dudley, Detroit, Michigan, for the purpose of manufacturing and distributing controlled substances, all in violation of Title 21, United States Code, Section 856(a)(1).

**FORFEITURE ALLEGATIONS**

(21 U.S.C. § 853, 18 U.S.C. §§ 924(d), 981(a)(1)(C)  
and 28 U.S.C. § 2461)

The allegations contained in this Indictment are incorporated by reference herein to allege forfeiture pursuant to the provisions of Title 21, United States Code, Section 853, Title 18, United States Code, Sections 924(d) and 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

**Title 21 Offense.** Upon conviction of a Title 21 Offense charged in this Indictment, Defendants shall forfeit to the United States: (a) any property constituting, or derived from, any proceeds which the Defendants obtained, directly or indirectly, as the result of such violation, and (b) any property which the Defendant used or intended to be used in any manner or part to commit or to facilitate the commission of such violation, and/or any property involved in such violation.

**Title 18 Offense.** Upon conviction of offenses under Title 18, United States Code, Section 924(c), as charged in this Indictment, Defendants shall forfeit to the United States any property, real or personal, involved in, or used in any knowing commission of these violations.

**Substitute Assets.** Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b), Defendant shall forfeit substitute property, up to the value of the property described above, if, by any act or omission of the defendant, the property described above cannot be located upon the exercise of due diligence; has been transferred, sold to or deposited with a third party; has been placed beyond the jurisdiction of the court; has

been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

**Money Judgment.** The United States will seek judgment for a sum of money in United States currency in an amount up to the value of the property subject to forfeiture, as described above, resulting from Defendants' violations of Title 21 and Title 18 as alleged in this Indictment.

THIS IS A TRUE BILL.

s/ Grand Jury Foreperson  
Grand Jury Foreperson

Dawn N. Ison  
United States Attorney

s/ John N. O'Brien, II  
John N. O'Brien, II  
Acting Chief, Drug Task Force

s/ Timothy P. McDonald  
Timothy P. McDonald  
Assistant U.S. Attorney

Dated: February 8, 2022

United States District Court  
Eastern District of Michigan

**Criminal Case Cover**

Case: 2:22-cr-20059  
Judge: Edmunds, Nancy G.  
MJ: Grand, David R.  
Filed: 02-08-2022 At 03:48 PM  
INDI USA V. SEALED MATTER (DA)

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete

<b>Companion Case Information</b>	<b>Companion Case Number:</b>
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :	<b>Judge Assigned:</b>
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<b>AUSA's Initials:</b> s/TM

**Case Title:** USA v. Valentino Richardson, et. al.

**County where offense occurred :** Wayne

**Check One:** ☒ **Felony** ☐ **Misdemeanor** ☐ **Petty**

☒ Indictment/ ☐ Information --- **no** prior complaint.  
☐ Indictment/ ☐ Information --- based upon prior complaint [Case number: \_\_\_\_\_]  
☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

**Superseding Case Information**

**Superseding to Case No:** \_\_\_\_\_ **Judge:** \_\_\_\_\_

- ☐ Corrects errors; no additional charges or defendants.  
☐ Involves, for plea purposes, different charges or adds counts.  
☐ Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
-----------------------	----------------	--

**Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.**

February 8, 2022  
Date

s/Timothy McDonald  
 Timothy McDonald  
 Assistant United States Attorney  
 211 W. Fort Street, Suite 2001  
 Detroit, MI 48226-3277  
 Phone: 313-226-0221  
 Fax: 313-226-3265  
 E-Mail address: Timothy.McDonald@usdoj.gov  
 Attorney Bar #: P64562

<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.